

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JUAN IGARTUA, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

LATE BLOOMERS NYC LLC,

Defendant.

Case No.: 1:24-cv-07966-JHR-  
GS

**MOTION FOR DEFAULT  
JUDGMENT AND  
PERMANENT INJUNCTION**

**PLEASE TAKE NOTICE** that Plaintiff Juan Igartua, pursuant to Federal Rules of Civil Procedure 55(b) moves this Court for a default judgment and permanent injunction against Defendant, Late Bloomers NYC LLC. The grounds for this motion are set forth in the accompanying Affirmation in Support and Memorandum of Law.

Respectfully submitted,

**Joseph & Norinsberg, LLC**



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Dated: March 24, 2025  
New York, New York